

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Kal Freight Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-90614 (CML)

(Jointly Administered)

**JOINDER OF TRIUMPH COMMERCIAL FINANCE, LLC AND TBK BANK, SSB TO
OBJECTIONS TO THE COMBINED DISCLOSURE STATEMENT AND PLAN OF
LIQUIDATION OF KAL FREIGHT INC. AND ITS AFFILIATED DEBTORS UNDER
CHAPTER 11 OF THE BANKRUPTCY CODE**

Triumph Commercial Finance, LLC (“Triumph”) and TBK Bank, SSB (“TBK”) hereby join in objections filed to the Disclosure Statement, including the objection filed by Truist Equipment Finance Corp. [Docket No. 574] and respectfully represent as follows:

Limited Background

1. The Debtors filed these chapter 11 cases on December 5, 2024 (the “Petition Date”).
2. On December 18, 2024, the Office of the United States Trustee (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors (the “Committee”).
3. On February 11, 2025, the Debtors filed their Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code (“Plan”) [Docket No. 515].²

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification numbers, are: KAL Freight Inc. (0249); KAL Aviation LLC (2600); KAL Partz Inc. (0139); KAL Trailers & Leasing Inc. (0840); and KVL Tires Inc. (0320). The location of the Debtors’ service address in these Chapter 11 cases is 10156 Live Oak Ave., Fontana, CA 92335.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

Joinder

4. Triumph and TBK object to the Disclosure Statement and join in all other objections, arguments and authorities, to the extent not inconsistent with their position.

Reservation of Rights

5. Triumph and TBK reserve their rights to amend or supplement this joinder and/or make such other and further objection as necessary or appropriate, including, but not limited to, any proposed order in regard to the confirmation of the Debtors' proposed chapter 11 plan.

WHEREFORE, Triumph and TBK request the Court sustain this joinder and grant such other and further relief as may be just and proper under the circumstances.

Dated: February 27, 2025

By: /s/ Michael S. Held

Michael S. Held

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**COUNSEL FOR TBK BANK, SSB AND
TRIUMPH COMMERCIAL FINANCE,
LLC**

CERTIFICATE OF SERVICE

I certify that on February 27, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Michael S. Held

Michael S. Held